

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

JOHN PRINCE,

)

)

Plaintiff,

)

v.

)

Case No.: 5:20-cv-00208-LCB

)

HUI HULIAU, DERYL WRIGHT, and

)

HOWARD RUSSELL,

)

)

Defendants.

)

**UNOPPOSED MOTION TO FILE UNDER SEAL
BY DEFENDANT HUI HULIAU**

Defendant Hui Huliau moves the Court for permission to file under seal its “Motion for Approval of Certain Operational Changes.” As grounds, Hui Huliau states:

1. Plaintiff John Prince does not oppose this motion. This was confirmed by the undersigned via telephone with counsel for plaintiff.

2. Pursuant to the Consent Injunction (doc. 14), Hui Huliau seeks the Court’s approval of certain operational changes. After extensive discussion between plaintiff and Hui Huliau, the parties were unable to reach an agreement. As a result, it is necessary for Hui Huliau to seek the Court’s approval on these issues.

3. The proposed operational changes involve sensitive business information that could be detrimental to Hui Huliau if made public. Under the terms

of the Consent Injunctive, plaintiff was required to keep this information in “strict confidence” in recognition of its sensitive nature. (Doc. 14, ¶ 3). To keep the information confidential, Hui Huliau requests the Court to allow the motion for approval and its supporting documents to be filed under seal.

WHEREFORE, Hui Huliau requests the Court to enter an order allowing it to file a “Motion for Approval of Certain Operational Changes” under seal.

S/Lauren A. Smith

Lauren A. Smith (ASB-0432-E48S)

C. Gregory Burgess (ASB-1519-R79C)

Stephanie M. Gushlaw (ASB-1050-F67A)

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of May, 2020, I electronically filed the foregoing with Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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S/Lauren A. Smith

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